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**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

H. CRISTINA CHEN-OSTER and SHANNA  
ORLICH,

Plaintiffs,

-against-

GOLDMAN, SACHS & CO. and THE  
GOLDMAN SACHS GROUP, INC.,

Defendants.

**No. 10 Civ. 6950 (AT) (JCF)**

**REPLY DECLARATION OF ANNE B.  
SHAVER IN SUPPORT OF PLAINTIFFS'  
MOTION TO EXCLUDE EXPERT  
TESTIMONY OF MICHAEL CURRAN**

I, Anne B. Shaver, declare:

1. I am an attorney licensed to practice in California and admitted in this matter *pro hac vice*. I am an associate at the firm of Lieff Cabraser Heimann & Bernstein, LLP (“LCHB”), Co-Lead Counsel for the named Plaintiffs (“Plaintiffs”). I submit this declaration in support of Plaintiffs’ Reply In Support of Plaintiffs’ Motion to Exclude Expert Testimony of Michael Curran. I have personal knowledge of the facts set forth herein and could competently testify to them if called as a witness.

2. Attached hereto as Exhibit A is a true and correct copy of excerpts from the deposition of Michael Curran, January 3, 2014.

3. Attached hereto as Exhibit B is a true and correct copy of the backup files produced by Goldman Sachs to Plaintiffs in response to Plaintiffs’ subpoena to Michael Curran.

4. Attached hereto as Exhibit C is a true and correct copy of the January 6, 2014 Letter from Anne B. Shaver to Defense Counsel.

\* \* \*

I declare under penalty of perjury under the laws of the United States and the State of New York that the foregoing is true and correct to the best of my knowledge and that this declaration was executed in San Francisco, California on September 24, 2014.



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Anne B. Shaver